

**REMARKS**

Claims 4-23 and 25-47 are currently pending in the application. By this amendment, claims 4, 23, and 27 have been amended, and new independent claim 46 and new dependent claim 47 have been added. Applicant thanks Examiner for the indication that claims 4-22 and 27-45 are drawn to allowable subject matter. Applicant submits that claims 4-22 and 27-47 of the application are in *prima facie* condition for allowance. The foregoing separate sheets marked as "Listing of Claims" show all the claims in the application, with an indication of the current status of each.

**Claim Objections**

Claims 4 and 27 have hereby been amended to comply with Examiner's direction to include the word "direction" at appropriate locations, and to replace "a" with "the" at the indicated locations. Applicant respectfully submits that these amendments overcome these objections and request allowance of these claims.

Claims 24 and 25 are objected to as being dependent on a rejected base claim but would be allowable if rewritten to include all the limitations of the base claim, and any intervening claims. New claims 46 is a replica of cancelled claim 24 and includes all the features of the base claim 23. The form of claim 23 that is utilized is the currently amended form, which overcomes the 35 USC §112, second paragraph rejection described below. Applicant submits that new claim 46 therefore does not constitute the addition of new matter, all features of the claim having been present in previously presented claims. New claim 47, which depends from new claim 46, is analogous to cancelled claim 25 and should be patentable since it depends from a patentable base claim.

Applicant requests consideration and allowance of new claims 46 and 47.

**Claim Rejections under 35 USC §112, second paragraph**

Claims 23-26 stand rejected under 35 USC §112, second paragraph, as indefinite. The Examiner states that inclusion of references to "M directions and N steps" is indefinite and suggested removal of all references to the number of steps and directions. Applicant has hereby amended claim 23 by removing all references to directions and steps. Similarly, new claims 46 and 47 do not include this recitation. Further, Examiner has stated that the terms "arrangement"

and "corresponds" with respect to the memory unit are unclear. Applicant has hereby amended claim 23 to remove the phrase which contains these terms.

In view of these amendments, Applicant respectfully request withdrawal of this rejection.

**Claim Rejections under 35 USC §102(b)**

Claims 23 and 26 stand rejected under 35 USC §102(b) as anticipated by Royer et al.

Applicant traverses this rejection on the basis of the arguments that follow.

Royer et al. (hereafter Royer) teach a technique for inputting Japanese letters using a standard telephone keypad. (See for example, the title; the abstract; and column 1, line 51. In particular, column 2, lines 3-6 state "The telephone instrument 10 also includes a keypad 20 having a set of twelve keys arranged in a manner that is conventional to most telephone instruments. Additionally included with the keypad is a set of nine keys arranged in a manner that is conventional to many cellular telephone instruments." The next lines of this same paragraph continue to describe the disposition of the Japanese letters with respect to the twelve conventional keys. "The arrangement of the twelve keys includes labeling that is partly conventional and partly novel, the novel part being an aspect of the present invention. The conventional labeling includes labeling the keys in numerical order (left to right, top to bottom): 1, 2, 3, 4, 5, 6, 7, 8, 9, \*, 0, #. The novel part of the labeling includes a symbol from the kata-kana matrix disposed adjacent to each key labeled with one of the numbers..." In other words, in the invention of Royer, the kata-kana symbols are associated with ("disposed adjacent to" keys of the conventional, known keypad. The disposition is illustrated in Figure 1, where the association can be viewed, and where, for example, the symbol "A" is disposed adjacent to key #1, "KA" is disposed adjacent to key #2, etc. This arrangement works because, fortuitously, Japanese pronunciation (which the kata-kana symbols represent) includes 50 basic sounds, and the kata-kana symbols corresponding to the sounds can be completely described when arranged in a matrix of 10 columns (which represent all 10 consonant sounds) and five rows (which represent all five vowel sounds). On a conventional keypad, the ten 0-9 keys can be associated with the 10 consonant sounds, and the five vowel sounds can be represented by some means which allows scrolling through the five choices after one consonant sound is chosen. In the invention of Royer, a consonant sound is initially selected by hitting the key corresponding to the consonant, and then successive hits on the same key scroll through the choice of five vowels. The final choice is

registered by depression of another function key on the keyboard (see column 3, lines 43-45). In an alternative embodiment, a separate "rocker" key is used. Repeated depression of the key in one direction (either left or right, depending on the programming) selects and scrolls through consonants, and repeated depressions of the key in the other direction scrolls through vowels (column 4, lines 11-14), allowing the user to, after repeated hits, arrive at the combination of consonant and vowel that represents the desired symbol. As many as 15 successive hits may be required to arrive at a desired symbol (column 4, line 5).

In contrast, the method of claim 23 of the present application does not involve association of letters and symbols with the keys of a conventional keypad. Rather, the present invention provides a totally different mode of selecting symbols, for example, those associated with the kana-kata phonetic system. In the present invention, symbols are disposed in the form of one or more concentric circles, where a position on the circumference of a circle corresponds to a letter or symbol. The device utilized to operate in such a system is depicted in Figure 1, which shows a "stick or like pointer" (page 16, lines 28) capable of moving from the center of a circle outward along one of several directions to a point on the circumference. The direction that is selected corresponds, for example, to a consonant sound of the kata-kana symbol system. The pointer is then moved along the circumference to one of several possible positions on the circumference, each of which corresponds to, for example, a vowel sound of the kata-kana symbol system. Thus, by positioning the pointer at a particular coordinate on the circumference of a circle, a symbol (composed of one consonant and one vowel sound) can be designated, the consonant corresponding to the direction of movement from the center of the circle, and the vowel corresponding to the position along the circumference of the circle. The coordinates are of course predetermined by dividing the circle into a convenient number of sectors in order to provide the requisite number of coordinates to accommodate the symbol system being represented.

Applicant submits that at no point in the disclosure provided by Royer is the arrangement of letters/symbols in the form of concentric circles either shown or discussed. Rather, as discussed above, Royer associates letters/symbols with the 0-9 keys of a conventional key pad which is clearly not a "concentric circle form". No disposition of letters/symbols in a concentric circle form, as is required by claim 23, is shown or discussed by Royer, and indeed is not necessary and would not even be possible in that method. No inputting of letters/symbols by

designating coordinates on a concentric circle form, as required by claim 23 of the present invention, is shown or discussed by Royer. Again, such a step would be pointless and nonsensical in the context of the method of Royer, in which the letters/symbols are instead linked to multiple depressions of a 0-9 key of a conventional keypad, or to a two-position rocker key.

In view of the foregoing, Applicant respectfully requests reconsideration and allowance of claims 23 and 26.

**Formal Matters and Conclusion**

In view of the foregoing, it is requested that the application be reconsidered, that claims 4-23 and 25-45 of the present application be allowed, and that the application be passed to issue.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at 703-787-9400 (fax: 703-787-7557; email: ruth@wcc-ip.com) to discuss any other changes deemed necessary in a telephonic or personal interview.

If an extension of time is required for this response to be considered as being timely filed, a conditional petition is hereby made for such extension of time. Please charge any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041.

Respectfully submitted,



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